UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SINGULAR COMPUTING LLC,	Civil Action No. 1:19-cv-12551-FDS
Plaintiff,	Hon. F. Dennis Saylor IV
v.	
GOOGLE LLC,	
Defendant.	

DECLARATION OF KEVIN GANNON
IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDANT'S
MOTION FOR FURTHER CLAIM CONSTRUCTION

I, Kevin Gannon, hereby declare as follows:

1.   I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for plaintiff,

Singular Computing LLC ("Singular"), in this action. I submit this declaration in support of

Singular's opposition to the motion of defendant, Google LLC ("Google"), for further claim

construction.

2.   Attached hereto as Exhibit A is a true and correct copy of an email from Nathan

R. Speed to Kevin Gannon *et al.* dated October 26, 2023.

3.   Attached hereto as Exhibit B is a true and correct copy of a dictionary excerpt

downloaded from www.merriam-webster.com/dictionary/unit on November 10, 2023

(highlighting added).

4.   Attached hereto as Exhibit C is a true and correct copy of a dictionary excerpt

downloaded from www.dictionary.com/browse/unit on November 13, 2023 (highlighting added).

5.   Attached hereto as Exhibit D is a true and correct copy of a dictionary excerpt

downloaded from www.britannica.com/dictionary/unit on November 10, 2023 (highlighting

added).

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6.   Attached hereto as Exhibit E is a true and correct copy of a dictionary excerpt downloaded from www.oxfordlearnersdictionaries.com/definition/english/unit# on November 13, 2023 (highlighting added).

7.   Attached hereto as Exhibit F is a true and correct copy of a dictionary excerpt downloaded from www.yourdictionary.com/unit on November 10, 2023.

8.   Attached hereto as Exhibit G is a true and correct copy of a dictionary excerpt downloaded from https://dictionary.sensagent.com/Execution%2520unit/en-en# on November 10, 2023 (highlighting added).

9.   Attached hereto as Exhibit H is a true and correct copy of an excerpt downloaded from https://en.wikipedia.org/wiki/Execution_unit on November 10, 2023.

10.   Attached hereto as Exhibit I is a true and correct copy of a dictionary excerpt downloaded from www.dictionary.university/Processing%2520element# on November 13, 2023 (highlighting added).

11.   Attached hereto as Exhibit J is a true and correct copy of a dictionary excerpt downloaded from https://dictionary.cambridge.org/dictionary/processing-element# on November 10, 2023 (highlighting added).

12.   Attached hereto as Exhibit K is a true and correct copy of a document produced in this case by Google and identified with production number GOOG-SING-00063906.

13.   Attached hereto as Exhibit L is a true and correct copy of a an excerpt downloaded from https://en.wikipedia.org/wiki.Massively_parallel on November 13, 2023 (highlighting added).

14.   Attached hereto as Exhibit M is a true and correct copy of an excerpt from

Computer Architecture A Quantitative Approach (Third Edition), by John L. Hennessy and

David A. Patterson (highlighting added).

15.   Attached hereto as Exhibit N is a true copy of an excerpt from *A Dictionary of*

Computer Science (Seventh Edition), published by Oxford University Press

16.   Attached hereto as Exhibit O is a true copy of excerpts from the transcript of the

deposition of Dr. Miriam Leeser taken in this case on March 8, 2023.

17.   Attached hereto as Exhibit P is a true and correct copy of U.S. Patent Application

No. US 2018/0336165 A1 titled "performing Matrix Multiplication in Hardware" (highlighting

added).

Executed at Boston, Massachusetts on November 13, 2023.

/s/ Kevin Gannon